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15 Attorneys for Applicant  
16 UNITED STATES OF AMERICA

17 UNITED STATES DISTRICT COURT

18 FOR THE CENTRAL DISTRICT OF CALIFORNIA

19 SOUTHERN DIVISION

20 UNITED STATES OF AMERICA,

21 No. SA17-CR-85

22 Plaintiff,

23 FOR ORDER SEALING INDICTMENT AND  
24 RELATED DOCUMENTS; MEMORANDUM OF  
25 POINTS AND AUTHORITIES;  
DECLARATION OF MARK TAKLA

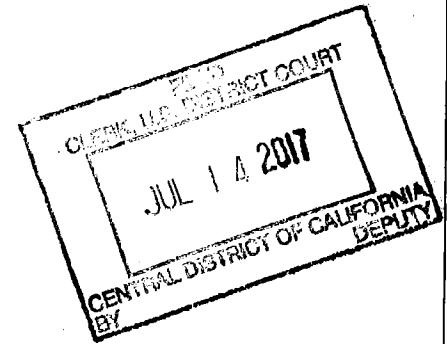
v.

RAHSEED AL JIJAKLI,

Defendant.

(UNDER SEAL)

18  
19 The government applies ex parte for an order directing that the  
20 indictment, arrest warrant, and any related pleadings in the above-  
21 titled case, as well as this ex parte application, the memorandum of  
22 points and authorities, the declaration of Mark Takla, and this  
23 Court's sealing order, be kept under seal until the defendant has  
24 been taken into custody on the indictment or the government moves to  
25 unseal the indictment, whichever occurs first.



This ex parte application is made pursuant to Federal Rule of Criminal Procedure 6(e)(4) and is based on the attached declaration of Mark Takla.

Dated: July 14, 2017

Respectfully submitted,

SANDRA R. BROWN  
Acting United States Attorney

PATRICK R. FITZGERALD  
Assistant United States Attorney  
Chief, National Security Division

MARK TAKLA  
Assistant United States Attorney

Attorneys for Plaintiff  
UNITED STATES OF AMERICA

DECLARATION OF MARK TAKLA

I, Mark Takla, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I represent the government in the prosecution of United States v. Rasheed Al Jijakli, the indictment of which is being presented to a federal grand jury in the Central District of California on July 19, 2017.

9       2. The defendant charged in the above-captioned indictment has  
10      not been taken into custody on the charge contained in the indictment  
11      and has not been informed that he is being named as a defendant in  
12      the indictment. The likelihood of apprehending the defendant, as  
13      well as the safety of arresting officers, might be jeopardized if the  
14      indictment in this case were made publicly available before the  
15      defendant is taken into custody on the indictment.

16       3. Accordingly, the government requests that the indictment  
17 and related pleadings (but not the arrest warrant) be sealed until  
18 the defendant is taken into custody on the charges contained in the  
19 indictment and the government either notifies the clerk's office in  
20 writing of that fact or moves to unseal the indictment, whichever  
21 occurs first.

22 I declare under penalty of perjury that the foregoing is true  
23 and correct to the best of my knowledge and belief.

24 DATED: July 14, 2017

Mark J. Lee

MARK TAKLA